

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 18-20508-JAD
Anthony Jarvis	:	Chapter 13
Jacqueline Jarvis	:	Judge Jeffery A. Deller
	:	*****
Debtor(s)	:	
	:	
JPMorgan Chase Bank, N.A.	:	Date and Time of Hearing
	:	Place of Hearing
vs	:	November 28, 2018 at 10:00 a.m.
	:	
Anthony Jarvis	:	Courtroom D, 54th Floor
Jacqueline Jarvis	:	U.S. Steel Tower
	:	600 Grant Street
Ronda J. Winnecour	:	Pittsburgh, PA 15219
Respondents.		

**MOTION TO CONTINUE NOVEMBER 28, 2018 HEARINGS ON THE MOTION FOR
RELIEF FROM THE AUTOMATIC STAY WITH CONCURRENCE**

JPMorgan Chase Bank, N.A. ("Creditor") by and through undersigned counsel and respectfully moves this Court for an Order to continue the November 28, 2018 at 10:00 a.m. hearings scheduled for Creditor's Motion for Relief from the Automatic Stay averring as follows:

1. On October 26, 2018, Creditor filed a Motion for Relief from Automatic Stay ("Motion") and on November 11, 2018, Debtor filed a Response to the Motion.
2. A hearing on the matter is scheduled for November 28, 2018 at 10:00 a.m.
3. Debtor's counsel and Creditor's counsel agree additional time is needed to resolve the issue regarding the Motion which includes an amended plan to be filed by Debtor's counsel.
4. Debtor's counsel and Creditor's counsel request a continuance of the November 28, 2018 hearing for sixty (60) days to try to resolve the issues.

WHEREFORE, JPMorgan Chase Bank, N.A. respectfully requests this Honorable Court to enter an order continuing the Motion for 60 days or a date and time that is convenient for the Court.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Kimberly A. Bonner (89705)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Edward H. Cahill (0088985)

Manley Deas Kochalski LLC

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Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

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**CERTIFICATE OF SERVICE MOTION TO CONTINUE NOVEMBER 28, 2018
HEARINGS ON THE MOTION FOR RELIEF FROM THE AUTOMATIC STAY WITH
CONCURRENCE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on November 21, 2018.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and/or electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: November 21, 2018

By: /s/ Karina Velter
Signature
Karina Velter, Esquire
Typed Name
P.O. Box 165028, Columbus, OH 43216-5028
Address

614-220-5611

Phone No.

94781

List Bar I.D. and State of Admission

Karina Velter, Attorney for Creditor, Manley Deas Kochalski LLC, P.O. Box 165028, Columbus, OH 43216-5028 (notified by ecf)

Office of the United States Trustee, Liberty Center, 1001 Liberty Avenue, Suite 970, Pittsburgh, PA 15222 (notified by ecf)

Ronda J. Winnecour, Chapter 13 Trustee, Suite 3250, USX Tower, 600 Grant Street, Pittsburgh, PA 15219 (notified by ecf)

Paul W. McElrath, Attorney for Debtor, McElrath Legal Holdings, LLC., 1641 Saw Mill Run Boulevard, Pittsburgh, PA 15210 (notified by ecf)

Anthony JarvisJacqueline JarvisDebtor, 741 Ohio Avenue, Midland, PA 15059 (notified by regular US Mail)